

# EXHIBIT A

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20 ORACLE AMERICA, INC.

21 **UNITED STATES DISTRICT COURT**  
22 **NORTHERN DISTRICT OF CALIFORNIA**  
23 **SAN FRANCISCO DIVISION**

24 ORACLE AMERICA, INC.

25 Plaintiff,

26 v.

27 GOOGLE, INC.

28 Defendant.

Case No. CV 10-03561 WHA

**PLAINTIFF'S NOTICE OF DEPOSITION  
OF DEFENDANT GOOGLE, INC.  
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

Dept.: Courtroom 9, 19th Floor  
Judge: Honorable William H. Alsup

1 TO DEFENDANT GOOGLE, INC., AND TO ITS ATTORNEYS OF RECORDS:

2 PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiff  
3 Oracle America, Inc. (“Oracle”), will take the deposition of Defendant Google, Inc. (“Google”). The  
4 deposition may be recorded by stenographic means, audiotaped, videotaped, and transcribed using real  
5 time interactive transcription such as LiveNote. The deposition will commence on a mutually agreeable  
6 date(s) and time and continue from day to day until completed. The deposition will take place at the  
7 offices of Boies, Schiller & Flexner, located at 1999 Harrison Street, Suite 900, Oakland, California  
8 94612.

9 **INSTRUCTIONS**

10 Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Google shall designate one or  
11 more of its officers, directors, partners, managing agents, or other persons who consent to testify on  
12 Google’s behalf and who are the most knowledgeable with respect to the deposition topics set forth  
13 below. At least ten days in advance of the date of deposition, Google is directed to provide to counsel  
14 for Oracle a written designation of the name(s) and position(s) of the person(s) designated to testify on  
15 each of the following topics.

16 **TOPICS**

17 1. Any discussions between Google, on the one hand, and Sun or Oracle, on the other hand,  
18 concerning Android or the development or licensing of platform technology for mobile devices at any  
19 time between 2005 and the filing of this lawsuit, including Google’s evaluation of any financial or other  
20 terms for such development or licensing proposed to or by Google.

21 2. Google’s revenues related to Android, including (i) the identity of each person with  
22 knowledge regarding such revenues, (ii) how Google accounts for Android-related revenues and  
23 expenses, (iii) all profits and losses, revenues, expenses, and costs associated with Android, including  
24 those associated with Android Market and advertising on Android-enabled devices, (iv) any financial  
25 projections relating to Android, including the bases for Eric Schmidt’s statement that “Google is  
26 positioning itself to earn \$10 billion or more per year in the mobile device business, thanks to its  
27 Android operating system.”

1 Dated: March 10, 2011

BOIES, SCHILLER & FLEXNER LLP

2 By: /s/ Steven C. Holtzman  
3 Steven C. Holtzman

4 *Attorneys for Plaintiff*  
5 ORACLE AMERICA, INC.

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